

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TENNESSEE
GREENEVILLE DIVISION**

JANE DOE1, JANE DOE 2, JANE DOE 3,
JANE DOE 4, JANE DOE 5, K.T. AND M.T.,
PERSONAL REPRESENTATIVES TO JANE
DOE 6, JANE DOE 7, JANE DOE 8, AND
JANE DOE 9,

Plaintiffs,

v.

Case No. 2:23-cv-00071-TRM-JEM

CITY OF JOHNSON CITY, TENNESSEE, et al.

**MOTION TO QUASH SUBPEONA OR IN THE
ALTERNATIVE AN EXTENSION OF TIME FOR COMPLIANCE**

COMES NOW, the Non-Party, Alunda Rutherford, by and through its undersigned counsel and pursuant to Fed. R. Civ. P. 45(d)(3), hereby moves to Quash the Plaintiff's Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Civil Action issued by the Plaintiffs' counsels from the United States District Court for the Eastern District of Tennessee, as said subpoena is overly broad and burdensome to the Non-Party, fails to provide a reasonable time for compliance, fails to provide place to send requested documents and information, fails to provide address of location of premises to be inspected, and constitutes an abuse of the subpoena power.

I. BACKGROUND

The present lawsuit concerns an alleged cover up of crimes perpetrated by members of the Johnson City, Tennessee Police Department on behalf of Sean Williams. The alleged

crimes included rape and drug activity that were believed to be covered up began in 2018 and continued to 2021.

II. ARGUMENT

Ms. Rutherford began their personal relationship Mr. Williams around 2010 and their personal relationship ended in 2017. Since the ending of their personal relationship, Ms. Rutherford's communications with Mr. Williams have been infrequent and these infrequent communications are not relevant to the pending action before this Court. Upon his arrest, federal and state law enforcement officials met with Ms. Rutherford to discuss any information she may have and they concluded that she had no relevant information regarding his alleged criminal activity.

Plaintiff's complaint does not allege any improper activities by Ms. Rutherford. In fact the only time Ms. Rutherford's name has come up is through a posting on FaceBook by someone using the name of Sean Williams, who was incarcerated at the time. The Plaintiffs are using this anonymous posting as the basis to harass Mr. Rutherford and attempt to involve her in this case, which she has no relevant knowledge or have in her possession any relevant documents.

The Plaintiffs' subpoena provides no location on where to provide the documents in that it simply states "TBD". The subpoena further fails to provide the address of the premises to be inspected.

The Non-Party asks the Court to quash this subpoena due to it being overly broad and unduly burdensome on the Non-Party due to its requests and vagueness.

WHEREFORE, the Non-Party, Alunda Rutherford, respectfully requests that this Court enter an order quashing the subpoena or in the alternative an extension of time for compliance with the subpoena.

Respectfully submitted,

/s/ Jerome Cochran
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Counsel for Non-Party

CERTIFICATE OF SERVICE

I hereby certify that on April 30, 2024, I electronically filed the foregoing document with the Court's CM/ECF filing system. Notice of this filing will be sent to all parties of record by operation of the Court's electronic filing system.

/s/ Jerome Cochran
Jerome Cochran